

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

United States of America

v.

AHMED MOHAMED SHEIKH OSMAN

Case No. 16-3008 MB

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 28, 2016 in the county of Wilson in the Middle District of Tennessee, the defendant(s) violated:

Code Section

Title 18, United States Code,
Section 115(a)(1)(B)

Offense Description

threaten to assault, kidnap, or murder, a Federal law enforcement officer, Patrick Wright, a Special Agent with FBI, whose killing would be a crime under such section, with intent to impede, intimidate, or interfere with such law enforcement officer while he was engaged in the performance of official duties, or with intent to retaliate against such law enforcement officer on account of the performance of official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B).

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

☒ Continued on the attached sheet.

Mark Shafer

Complainant's signature

FBI SA Mark Shafer

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/04/2016

City and state: NASHVILLE, TN

Joe B. Brown

Judge's signature

Joe B. Brown, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Mark Shafer, being first duly sworn under oath, states as follows:

1. Your affiant is a Special Agent with the Federal Bureau of Investigation and has been so employed for eighteen years. As a Special Agent (SA), I am charged with the duty of investigating violations of the laws of the United States Code and collecting evidence in matters in which the United States is or may be a party of interest. I am currently assigned to the Nashville Violent Crime Gang Task Force of the Memphis Division of the FBI and, as such, am charged with investigating the range of violent incident crimes, including violations of 18 U.S.C. § 115.
2. I make this affidavit, in part, on personal knowledge based upon my direct participation in this investigation, and, in part, upon information learned during the course of this investigation from other sources. I am familiar with the facts and circumstances of this matter and the assertions made in this affidavit are based on first-hand knowledge or information received during the course of the investigation. Unless otherwise noted, the referenced information was provided by a person who may have either direct or hearsay knowledge of the statement. Except where indicated, all statements referred to below are set forth in substance and in part, rather than verbatim.
3. This affidavit is being submitted to establish the basis for the Criminal Complaint, but does not set forth each and every detail known by your affiant regarding this investigation for the arrest of Ahmed Mohamed Sheikh Osman for threats against a federal law enforcement officer, in violation of Title 18, United States Code, Section 115(a)(1)(B).
4. SA Patrick Wright, a duly sworn law enforcement officer who is employed as a Special Agent at the Nashville office of the Federal Bureau of Investigation, was conducting official business on January 29, 2016. Pursuant to those official duties and as part of an ongoing federal investigation, SA Wright went to a known address for Ahmed Mohamed Sheikh Osman, date of birth **/**/1975, Social Security Number ***-**-4481, in Antioch, Tennessee. When arriving at the address in Antioch, Tennessee, SA Wright did not make in-person contact with Osman. SA Wright then contacted cellular phone number 615-977-7219, which was reportedly utilized by Osman. The call was placed from SA Wright's official cell- phone from Nashville, Tennessee. At the beginning of the conversation, SA Wright identified himself as an FBI Special Agent. Osman subsequently identified himself and stated that he did live at the address in Antioch, Tennessee, but that he was in Arizona and would be in Arizona for a few additional days.

5. The phone conversation was described as cordial in nature. At the conclusion of the conversation, SA Wright requested Osman call him upon his return to the Nashville, Tennessee area. Osman confirmed with SA Wright that the 615-977-7219 number is the best number to reach him. SA Osman suggested that Osman look up the number to the FBI office on the internet and verify SA Wright's identity if Osman desired.
6. On Monday, February 1, 2016, SA Wright received a series of text messages on SA Wright's cellular telephone from 615-977-7219. The text messages included, in relevant part, the statements:
 - A. Yo mr FBI iama be around AZ for a while But you know what send me your name then I will have you booked the first non stop flight to come to me then I will make a luxury hotel reservation for you then when you come around you must open your mouth and tell me what's up
 - B. I will take care of the expense you just tell me what's up How much do you make a year?????
 - C. Not that I am trying to pay you off but I always pay for my freedom in the united States Iam not a refugee I belong to a rich powerful and the most fearful heros in Somalia
 - D. Let's do business never visit my house you gonna make my mom shocked and me you gonna make me wanna be stupid
7. SA Wright did not respond to the text messages, but did take a subsequent call from 615-977-7219 later on February 1, 2016. During that call, Osman identified himself and indirectly acknowledged making the previous texts by referencing the texts themselves. SA Wright requested Osman make contact with the Phoenix office of the FBI since Osman purportedly planned to remain in the Phoenix area for an unknown duration.
8. On February 25, 2016, at approximately 3:20 a.m., through March 4, 2016, SA Wright received numerous additional text messages from the 615-977-7219 number. The text messages included, in relevant part, the statements:
 - A. On February 25, 2016
 - a. FBI u good???

- b. For routine check calls
- B. On February 28, 2016, while SA Wright was in Wilson County, within the Middle District of Tennessee, when he received the following text messages:
- a. U r not not available at all u man u u u understand listen u r ignoring my phones okY but I want u to know that NO UNTIED STATES OF AMERICA LAW OFFECIALS scare of a answering me So u r the bad guy and u r dead ffffffff dead
 - b. I will find u
 - c. U rrr dead
 - d. Ffffffff fuck u and who u work for u fake ass
 - e. lied to me
 - f. U r a lying FBI yyyyyyy??????
 - g. U made a wrong turn
 - h. U r a talking steak
 - i. HXaaa
 - j. Dead
 - k. Dead
 - l. U r not FBI
 - m. U r haaaaaaa u made a wrong fucken turn
 - n. U r so fucken dead dead dead
 - o. Jus wait
 - p. Soon
 - q. U think a hillbilly ass like u would call me and use FBI title well u r and all ur family ur coworkers a fucken even everyone knows u's life is to be
 - r. Terminated
 - s. Eliminated

- t. Erased
- u. Desposed

C. On March 1, 2016

- a. U lied to me u identified my home my vehicle u r not answering my calls u r to be taken down ASAP
- b. U r a talking steak

D. On March 3, 2016

- a. U r one fucken dead United states F Fucken BI
- b. U think u can call me and get away with it u r fucken dead Fuck u and who ever fucken gave the fucken chance to call me visit my home identify my vehicle
- c. U R DEAD
- d. U r dead Mr united States of FBI
- e. Ffffffffff
- f. U lied
- g. Fffff u wRu_@
- h. ????????
- i. U r fffffff dead
- j. U r to be taken down
- k. Now
- l. Lying ass bitch
- m. HXaaaaaaaaaaaaaa
- n. Ffffff
- o. Fffffff fuck
- p. I will find u
- q. Insha ALLAH
- r. I will pay a lot to figure our your location by pin pointing your most call area fuck your hillbilly red nick ass neighbor's zone

family loved ones and even dead already
loved ones fuck I will still kill them second
times You Are dead

E. On March 4, 2016:

U r dead

Fuck u fuck the united States FBI federal berue of
investigations

Fffffff u laid

U r deax

Dead

Dead Fffffff w r u a@!?!?????

ALLAHU AKBAR ur dead

For lying

U r mistaken hillbilly ass nigar

A bitch ass nigar

U used the USA FBI title

U r dead

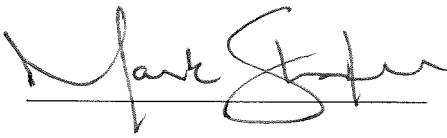
Ur family

All known u

Fffffffffffff

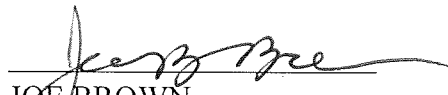
9. At approximately 4:23 a.m. on March 3, 2016, SA Wright received a voicemail message. SA Wright's call log reflected the call originated from the same 615-977-7219 number. In the message, the caller threatened SA Wright while invoking Allah and Mohammad.
10. On February 1, 2016, SA Wright was working in the Middle District of Tennessee, and his immediate family was present in the Middle District of Tennessee. On February 25, 2016, SA Wright was working in the Northern District of Alabama, while his immediate family was present in the Middle District of Tennessee. On February 28, 2016, SA Wright was present in the Middle District of Tennessee with his immediate family. On March 1, 3, and 4 of 2016, SA Wright was working in the Northern District of Alabama, while his immediate family was present in the Middle District of Tennessee.

11. SA Wright identified the caller from the March 3, 2016 4:23 a.m. call as the same voice with whom he had spoken to on the two previous occasions (January 29, 2016, and February 1, 2016), and who identified himself as Ahmed Mohamed Osman.
12. A query of public records revealed that cellular phone number 615-977-7219 is associated with Ahmed Mohamed Osman, date of birth **/**/1975, Social Security Number ***-**-4481, at Osman's known address in Antioch, Tennessee.
13. Based on the foregoing, your affiant submits there is probable cause to believe that Ahmed Mohamed Sheikh Osman committed a violation of Title 18, United States Code, Sections 115(a)(1)(B).



Mark Shafer
Special Agent
Federal Bureau of Investigation

Subscribed to and Sworn before me this 4th day of March, 2016.



JOE BROWN
United States Magistrate Judge
Middle District of Tennessee